

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION GULFPORT

REPUBLICAN NATIONAL COMMITTEE;
MISSISSIPPI REPUBLICAN PARTY;
JAMES PERRY; and MATTHEW LAMB,

Plaintiffs,

vs.

No. 1:24-cv-25-LG-RPM

JUSTIN WETZEL, *in his official capacity as the clerk and registrar of the Circuit Court of Harrison County*; TONI JO DIAZ, BECKY PAYNE, BARBARA KIMBALL, CHRISTENE BRICE, and CAROLYN HANDLER, *in their official capacities as members of the Harrison County Election Commission*; and MICHAEL WATSON, *in his official capacity as the Secretary of State of Mississippi*,

Defendants.

**DISABILITY RIGHTS MISSISSIPPI'S AND LEAGUE OF WOMEN VOTERS OF
MISSISSIPPI'S MOTION TO INTERVENE AS DEFENDANTS**

Pursuant to Rule 24(a) of the Federal Rules of Civil Procedure, Disability Rights Mississippi and the League of Women Voters of Mississippi (collectively, the “Proposed Intervenor-Defendants”) respectfully move to intervene as a matter of right as party-defendants in the above-captioned matter. In the alternative, the Proposed Intervenor-Defendants respectfully move for permissive intervention under Federal Rule of Civil Procedure 24(b). This motion is supported by the attached memorandum of law, declarations, and accompanying exhibits. Proposed Intervenor-Defendants also attach their proposed motion to dismiss and accompanying memoranda to be filed in the event that intervention is granted.

Pursuant to Local Rule 7(b)(10), counsel for Proposed-Intervenor Defendants contacted counsel for Plaintiffs and Defendants to determine their position, and both counsel for Plaintiffs and counsel for Defendant Secretary Watson declined to provide a position without advance review of the papers. No counsel for the other Defendants has yet entered an appearance.

Dated: February 21, 2024

Respectfully submitted,

/s/ Joshua Tom

Joshua Tom (Miss. Bar No. 105932)
AMERICAN CIVIL LIBERTIES UNION
OF MISSISSIPPI
P.O. Box 2242
Jackson, MS 39225
(601) 354-3408
JTom@aclu-ms.org

Greta Kemp Martin (Miss. Bar No. 103672)
DISABILITY RIGHTS MISSISSIPPI
5 Old River Place, Suite 101
Jackson, MS 39202
(601) 968-0600
gmartin@drms.ms

*Attorneys for Proposed Intervenor-
Defendants Disability Rights Mississippi and
League of Women Voters of Mississippi*

CERTIFICATE OF SERVICE

I certify that on February 21, 2024, the foregoing document was filed on the Court's CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Joshua Tom _____

Joshua Tom

*Counsel for Proposed Intervenor-Defendants
Disability Rights Mississippi and League of
Women Voters of Mississippi*